

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

LAKEIA GREEN,

Plaintiff,

v.

POTOMAC FAMILY DINING GROUP  
OPERATING COMPANY LLC, *doing  
business as* “APPLEBEE’S”

Defendant.

Case No.: 1:17-cv-01150-LO-MSN

**JOINT MOTION FOR APPROVAL OF SETTLEMENT**

Plaintiff Lakeia Green (“Plaintiff”) and Defendant Potomac Family Dining Group Operating Company, LLC (“Defendant”) (collectively the “Parties”) respectfully request that this Honorable Court approve a settlement agreement that the Parties have reached concerning Plaintiff’s lawsuit under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201 *et seq.* The Parties seek Court approval of this settlement because claims under the FLSA, like those released by Plaintiff in the Settlement Agreement and General Release (hereinafter “Agreement”) that all parties have entered into, may not be waived or released without U.S. Department of Labor or Court approval. The Parties further agree and request the Court to waive an oral hearing on this Motion.

Dated: April 19, 2019

Respectfully submitted,

By: /s/ Curtis Cannon

Curtis Cannon  
Goldberg Finnegan  
8401 Colesville Rd., Suite 630  
Silver Spring, MD 20910  
T:(301)589-2999  
E: ccannon@goldbergfinnegan.com

Nicholas Raymond Conlon  
Jason Tavis Brown  
JTB Law Group, LLC  
155 2nd Street, Suite 4  
Jersey City, NJ 07302  
T: (877) 561-0000  
E: nicholasconlon@jtblawgroup.com  
E: jtb@jtblawgroup.com

*Attorney for Plaintiffs*

/s/ Daniel C. Deacon

Kara M. Maciel (admitted pro hac vice)  
Jordan Schwartz (admitted pro hac vice)  
Daniel Deacon (VSB No. 87451)

CONN MACIEL CAREY LLP  
5335 Wisconsin Avenue, NW, Suite 660  
Washington, DC 20015  
Telephone: 202-909-2730  
Fax: 202-827-7899  
Email: kmaciel@connmaciel.com

*Attorneys for Potomac Family Dining  
Group Operating Company, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of April 2018, a copy of this Joint Motion for Approval of Settlement was served electronically on counsel for the Plaintiffs via the Court's CM/ECF system to:

Curtis Cannon  
Goldberg Finnegan  
8401 Colesville Rd., Suite 630  
Silver Spring, MD 20910  
T: (301) 589-2999  
E: ccannon@goldbergfinnegan.com

Nicholas Raymond Conlon  
Jason Tavis Brown  
JTB Law Group, LLC  
155 2nd Street, Suite 4  
Jersey City, NJ 07302  
T: (877) 561-0000  
E: nicholasconlon@jtblawgroup.com  
E: jtb@jtblawgroup.com

*Attorneys for Plaintiffs*

/s/ Daniel C. Deacon

Daniel C. Deacon